IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE COLUMBIA DIVISION

CHERYL JONES, LAQUANDA)
JACKSON, VERONICA DELONEY,)
SAMUEL JORDAN, ANGELA)
HORACE, BETERNIA BAKER,)
KIMIYA CARTER, and MARILYN)
NELSON, Individually and on behalf	No. 1:15-cv-00108
of all other similarly situated current)
and former employees,) FLSA Opt-In Collective Action
Plaintiffs,)) JURY DEMANDED)
v.))
JRN, INC., a Tennessee Corporation,)
JOHN R. NEAL, DAVID G. NEAL,)
and TYRONE K. NEAL, Individually,)
, , , , , , , , , , , , , , , , , , , ,	,)
Defendants.	,)

DECLARATION OF CLAIRE MOYE

I, Claire Moye, hereby state as follows:

- 1. My name is Claire Moye. I am over the age of eighteen and I have personal knowledge of the facts stated herein. I am competent to make the statements in this declaration.
 - 2. I am employed by JRN, Inc. as the Director of Human Resources.
- 3. All of the named Plaintiffs in this action worked for JRN's restaurants in the Columbus, Georgia area.
- 4. JRN employs Restaurant General Managers who observe the day-to-day operations and events at all of its restaurants, including its restaurants in the Columbus, Georgia area.

- 5. The following individuals are currently employed as Restaurant General Managers in JRN's Columbus, Georgia area restaurants:
 - Sandy Howell
 - Glenn Barnes
 - Erica Davis
 - Connie Jernigan
 - Gaetra Lyles
 - Tonie Hannah
 - Sherita Brooks
 - Saafi Shakoor
 - Yvonne Brundidge
- 6. There are approximately four individuals who were employed as Restaurant General Managers in JRN's Columbus, Georgia area restaurants within the past six years, but who are no longer employed by JRN.
- 7. The individuals identified in Paragraphs 5 and 6 of my Declaration managed the Plaintiffs and worked directly with the Plaintiffs.
- 8. The individuals identified in Paragraphs 5 and 6 of my Declaration observed the day-to-day operations and events at JRN's Columbus, Georgia area restaurants where the Plaintiffs worked for JRN.
- 9. Plaintiffs' personnel files are located at JRN's restaurants in the Columbus, Georgia area.
- 10. Archives of employees' schedules are located at JRN's restaurants in the Columbus, Georgia area.

- 11. Archives of employees' timekeeping reports are located at JRN's restaurants in the Columbus, Georgia area.
- 12. Archives of weekly sales records are located JRN's restaurants in the Columbus, Georgia area.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 26, 2016.

Claire Moye 2/24/16